

**TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.**

ATTORNEYS AT LAW

**40 EXCHANGE PLACE**

**18TH FLOOR**

**NEW YORK, NEW YORK 10005**

(212) 482-0007 PHONE

(212) 482-1303 FAX

WWW.TALKINLAW.COM

EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:  
5100 DORSEY HALL DRIVE  
SUITE 100  
ELLCOTT CITY, MD 21042  
410-964-0300

NEW JERSEY OFFICE:  
79 MAIN STREET  
SUITE ONE  
HACKENSACK, NJ 07601  
201-342-6665

January 6, 2021

Honorable Kevin N. Fox  
United States Magistrate Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**MEMORANDUM ENDORSEMENT**

BY ECF AND EMAIL

Re: United States v. Davit Yeghoyan  
20 Cr. 652 (VM)

Dear Judge Fox:

Defendant Davit Yeghoyan ("Yeghoyan") is at liberty on a bond that contains numerous conditions including the posting of two properties as security. One of the properties that was presented to government and the Court that set Yeghoyan's bond, an apartment in Yonkers, New York, is no longer available. Yeghoyan has identified a substitute property, a home located at 153 Jackson Avenue Staten Island, New York 10305, that is acceptable to, and approved by, the government. For this reason, Yeghoyan respectfully request that his bond be modified to requiring the posting of the Staten Island property in the place of the Yonkers property currently on the bond.

The owner of the Staten Island property is Astghgik Shmavoyan ("Shmavoyan"), currently a co-signor on the bond of co-defendant Narek Marutyan ("Marutyan"). In order to post the property for Yeghoyan, she is required to be a signor on his bond. As a result, a substitute surety that has been vetted and approved by the government is prepared to sign Marutyan's bond as a replacement for Shmavoyan and Shmavoyan has been approved to sign Yeghoyan's bond. Yeghoyan respectfully requests that the Court authorize this substitution.

Page 2

January 6, 2021

This application is made to this Court because the District Judge assigned to case has referred all bail issues the Magistrate Court. The government consents to both of these applications. Thank you for Your Honor's consideration of these requests.

Very truly yours,

*Sanford Talkin*

Sanford Talkin

1/6/21

cc: AUSA Abigail Kurland (by ECF and email)  
AUSA Benet Kearney (by ECF and email)

Application granted.

SO ORDERED:

*Kevin Nathaniel Fox*

Kevin Nathaniel Fox, U.S.M.J.